

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- REVISED

PERMITTEE

Rycoline Products, Inc.
Attn: Edward Toliopoulos
5540 Northwest Highway
Chicago, Illinois 60630

Application No.: 95120197

I.D. No.: 031600FXP

Applicant's Designation: CONOP1097

Date Received: December 1, 2005

Subject: Printing Materials Manufacturing Plant

Date Issued: February 3, 2006

Expiration Date: October 21, 2008

Location: 5540 Northwest Highway, Chicago

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of twenty-one raw material and product storage tanks and twenty printing materials blending tanks pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued:
 - i. To limit the emissions of volatile organic material (VOM) from the source to less than major source thresholds (i.e., 100 tons/year, 10 tons/year for a single hazardous air pollutant (HAP) and 25 tons/year for totaled HAP). As a result, the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit.
 - ii. To limit the emissions of VOM from the source to less than 25 tons/year. As a result, the source is excluded from the requirement of 35 Ill. Adm. Code Part 205, Emission Reduction Market System. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
2. This permit is issued based upon the plant not being subject to the requirements of 35 Ill. Adm. Code Part 218 Subpart TT: Other Emission Units. This is consequence of the federally enforceable production and operating limitations, which restrict a potential to emit to less than 25 tons per year.
- 3a. No person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 946 l (250 gal), unless such tank is equipped with a permanent submerged loading pipe or an equivalent device [35 Ill. Adm. Code 218.122(b)].

- b. If no odor nuisance exists the limitation of Conditions 3(a) shall only apply to the loading of volatile organic liquid with a vapor pressure of 17.24 kPa (2.5 psia) or greater at 294.3°K (70°F) [35 Ill. Adm. Code 218.122(c)].
4. Total VOM emissions from the plant operations shall not exceed 22.7 tons/year as specified below:

- a. VOM emissions from the organic liquids storage tanks operations shall not exceed the following limits: 320 lbs/month, 1.6 tons/year.

VOM emissions from the operations of storage tanks shall be calculated using equations given by AP-42 (5th edition, Section 7.1) and utilized in the USEPA distributed computer programs TANKS.

- b. The operations and VOM emissions of the blending tanks shall not exceed the following limits:

VOM Throughput		Emission Factor	VOM Emissions	
<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Weight %)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
550	5,500	0.3	1.7	16.5

These limits are based on the maximum production rate and emission factor derived from the engineering calculations for the worst case product.

- c. This permit is issued based upon no VOM-containing solvents are used for the blending tanks cleanup operations and no varnish cooking or ink milling operations are performed.
- d. Fugitive VOM emissions from the plant operations shall not exceed 4.6 tons/year. It shall be calculated using USEPA SOCMF factors (EPA-453/R-95-017).

These limits define the potential emissions of the VOM and are based on the maximum allowable VOM throughput. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.

5. The operation and particulate matter (PM) emission of the 20 blending tanks (total) shall not exceed the following limits:

Solids Throughput		Emission Factor	PM Emissions	
<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Weight %)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
70	700	1.0	0.7	7.0

These limits are based on the maximum production rate and standard emission factors for solids handling (AP-42, Table 6-4.1). Compliance with annual limits shall be determined from a running total of 12 months of data.

6. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish by rule which would require the Permittee to obtain a Clean Air Act Permit Program permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a Clean Air Act Permit Program permit from the Illinois EPA.
7. The Permittee shall maintain monthly records of the following items:
 - a. Names and amount of VOM and HAP-containing raw materials used (tons/month, tons/year);
 - b. VOM and HAP content in the raw materials (weight %);
 - c. VOM and HAP emission calculations (tons/month, tons/year); and
 - d. Separate emission records for each individual HAP with emission rate exceeding 0.8 tons/month.
8. The Permittee shall maintain readily accessible records of the dimension of the storage vessels and an analysis of the capacity of the storage vessels. These records shall be kept for the life of the source [35 Ill. Adm. Code 218.129(e) and (f)].
9. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to the Illinois EPA or USEPA request for records during the course of a source inspection.
10. If there is an exceedance of the requirements of this permit, as determined by the record required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released, a copy of the relevant records, and a description of the exceedance or violation, and efforts to reduce emissions and future occurrences.
11. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control - Regional Office
9511 West Harrison
Des Plaines, Illinois 60016

It should be noted that this permit has been revised to reflect replacement of four blending tanks with three new ones described in Construction Permit 05120001.

If you have any questions on this permit, please call Valeriy Brodsky at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:VJB:psj

cc: IEPA, FOS Region 1
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emission from the Printing Materials Manufacturing Plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. This is use of 5,500 tons of VOM in raw materials per year. The resulting maximum emissions are below the levels, e.g., 25 tons per year of VOM, 10 tons per year for a single HAP, and 25 tons per year for totaled HAP at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that material is handled, and control measures are more effective than required in this permit.

<u>Operations</u>	E M I S S I O N S (Tons/Year)			
	<u>VOM</u>	<u>PM</u>	<u>Single HAP</u>	<u>Total HAPs</u>
Storage Tanks	1.6	---		
Mixing Tanks	16.5	---		
Fugitive	4.6	---		
Solids Handling	----	<u>7.0</u>		
Total	22.7	<u>7.0</u>	<u>< 10</u>	<u>< 25</u>

DES:VJB:psj